

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JODI NEELEY,

Plaintiff,

v.

GENESEE COUNTY, KANDY JENKINS  
and MATTHEW GOODMAN,

Defendants.

Case No. 2:22-CV-12415  
Hon.: Robert H. Cleland  
Mag.: Elizabeth A. Stafford

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**STIPULATED PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c) and the stipulation of the parties, the following is **ORDERED**.

**IT IS HEREBY ORDERED** that (1) all citizen complaints filed against any individual Defendant; (2) the complete training records for each individual Defendant; (3) the policies, procedures, and/or guidelines used to instruct

officers on probable cause for arrest and use of force; (4) any disciplines, including reprimands, for any of the individual Defendants; and (5) all performance evaluations for any of the individual Defendants shall be subject to the following conditions:

1. The documents subject to this protective order shall be used solely and exclusively for the purposes of the instant lawsuit and can be used in any and all court filings, judicial proceedings, depositions, alternative dispute resolution proceedings, trial, and/or any other judicially-related proceedings.
2. The documents subject to this protective order shall not be used in or for any other case, proceedings, dispute, or for any commercial, business, or competitive purpose whatsoever.
3. The documents subject to this protective order may be reviewed by Counsel for the parties, Counsels' staff, those individuals associated with the activities cited in subparagraph (1), and such experts and/or consultants as Counsel deems necessary for purposes of this litigation.
4. The documents provided pursuant to this Protective Order may be disclosed only to those individuals and/or entities identified in this Protective Order and must be used only by those individuals

and/or entities identified in this Protective Order and must only be used for purposes of this litigation.

**IT IS FURTHER ORDERED** that nothing in this Protective Order shall prevent a party from filing a Motion for Modification of the Protective Order.

**IT IS FURTHER ORDERED** that this Protective Order shall survive and remain in full force and effect until the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation, unless otherwise ordered by the Court.

**IT IS FURTHER ORDERED** that the documents produced under the Protective Order do not constitute an admission and/or agreement that any such document is admissible as evidence in this case. Determinations of evidence admissibility will be made by the Court in a separate proceeding.

**IT IS FURTHER ORDERED** that the documents produced pursuant to this protective order shall be destroyed by Plaintiff's and/or Defendants' Counsel after final disposition (including all appeals) of the case except any documents attached to any pleadings filed with the court, deposition exhibits, or other pleadings.

**IT IS SO ORDERED.**

DATED: April 26, 2023

s/Robert H. Cleland  
HONORABLE ROBERT H. CLELAND

We stipulate and agree to entry of the above Order:

s/Amy J. Derouin (w/consent)  
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